

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

**CHLOE BURNS**

*Plaintiff,*

**v.**

**BROWN UNIVERSITY**

*Defendant.*

**C.A. No. 1:23-cv-00086-JJM-PAS**

**DEFENDANT BROWN UNIVERSITY’S MOTION FOR SUMMARY JUDGMENT**

Under Federal Rule of Civil Procedure 56 and Local Rule Civil 56, Defendant Brown University (“Brown”) moves for summary judgment on all counts pled in Plaintiff’s Complaint (ECF No. 1):

- Count I alleging a retaliation claim under Title IX of the Education Amendments of 1972); and
- Count II alleging Intentional Infliction of Emotional Distress.

Brown has filed a supporting memorandum of law and a statement of undisputed facts with exhibits. Brown has moved to file the statement and exhibits under seal to ensure its compliance with the Stipulated Protective Order (ECF No. 15).

Brown requests oral argument on its motion for summary judgment and estimates that the hearing will require one hour on the Court’s calendar.

BROWN UNIVERSITY

By Its Attorneys,

/s/ Steven M. Richard

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Dated: March 7, 2025

CERTIFICATE OF SERVICE

I certify that, on the 7th day of March, 2025, I filed and served this Motion for Summary Judgment via the Court's CM/ECF system.

/s/ Steven M. Richard